

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	<b>Docket No.: 1:13CR350</b>
<b>v.</b>	)	<b>Judge Brinkema</b>
	)	
<b>JAMEEL ALEEM</b>	)	

**DEFENDANT JAMEEL ALEEM'S PROPOSED VOIR DIRE**

The defendant, by undersigned counsel, submits the attached proposed voir dire for inclusion by the Court in its questions to the jury panel. The defendant asks for leave of the Court to modify, withdraw, supplement or substitute proposed voir dire as may be suggested by the panel's response to these or other questions posed to the panel.

Respectfully submitted,

\_\_\_\_\_  
/s/  
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**Certificate of Service**

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 9<sup>th</sup> day of February, 2014, which will send a notification of such filing (NEF) to the following: to Adam Schwartz and Dennis Fitzpatrick, Assistant U.S. Attorneys, 2100 Jamieson Avenue, Alexandria, Virginia 22314 and all counsel of record.

\_\_\_\_\_/s/  
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**DEFENDANT JAMEEL ALEEM'S PROPOSED VOIR DIRE**

1. Is English your first language? If not, do you feel comfortable enough with your English to sit as a juror in a criminal case?
2. Have you or has any immediate family member, friend, coworker, neighbor or anyone else with whom you have close association, ever been a victim of any crime or ever been accused of any crime? If so,
  - a. What was the crime?
  - b. Who was the victim?
  - c. Who was the defendant?
  - d. When did the crime occur?
  - e. Where was the crime committed?
  - f. Was there an arrest?
  - g. Did the case go to trial?
  - h. What sentence(s) if any, was handed down?
  - i. How did you feel about the sentence?
3. Have you ever been a juror? If so, specify:
  - a. When?
  - b. Where?
  - c. The nature of the case.
  - d. Whether there was a verdict, and if so, what that verdict was.

- e. Your feelings about having served as a juror?
4. What impressions do you have of prosecutors and defense attorneys?
  5. What impressions do you have of criminal defendants?
  6. What impressions do you have of law enforcement officers?
  7. Are you more willing to accept the testimony of a law enforcement officer than the testimony of other witnesses? If so, why?
  8. Are you less willing to accept the testimony of the defendant than the testimony of any other witness? If so, why?
  9. Do you understand that every accused person enjoys a presumption of innocence, and that you are to presume the accused innocent unless and until proven guilty by the government beyond any reasonable doubt?
  10. Does the fact that the defendant has been charged with a crime suggest to you a greater possibility that the defendant is guilty than the rest of us in the courtroom?
  11. Have you heard or read anything in the news with regard to this case? If so, do you have any opinions of the alleged crime?
  12. Does the fact that some of the defendants are black affect your ability to be a fair and impartial juror? Why?

13. Does the fact that there will be multiple defendants on trial suggest anything to you about a greater likelihood of guilt?

14. Even though there are multiple defendants, the government will be required to prove the guilt beyond the reasonable doubt of every defendant separately.

Would you be able to determine a verdict of each defendant separately, regardless of the verdict you determine for any other defendant?

15. This case may involve discussion of the use of guns or firearms. Do you have strong feelings about the use of guns that may make it difficult for you to be a fair and impartial juror?

16. This case may involve discussion of the sale of drugs. Do you have strong feelings about drugs that may make it difficult for you to be a fair and impartial juror?

17. Do you have any visual, hearing or other medical issues that might make it difficult for you to serve as a juror?